



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

MAR - 2 1999

EC-2
990007

Ref: 8EPR-EP

Robert L. Storch
Forest Supervisor
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 Highway 50
Delta, Colorado 81416

Re: Sheep Flats Diversity Unit Timber Sales,
Draft Supplement to the Final Environmental
Impact Statement

Dear Mr. Storch:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the referenced Draft Supplement to the Final Environmental Impact Statement (DSFEIS).

We have reviewed the several new soil and water mitigation measures and monitoring requirements proposed to supplement the 1998 FEIS mitigation measures and monitoring requirements. We agree that diligent implementation of these measures and requirements will further reduce potential impacts to waters quality in the affected watersheds.

While the disclosure and analysis of present watershed impacts from sedimentation is more thorough than the 1998 FEIS, there remains a concern with the discussion on page 13 related to Best Management Practices (BMPs) and the implementation of Forest Plan standards. "Sites were considered to be safeguarded if Best Management Practices were in place and Forest Plan standards were being met. Where BMPs or standards were not being met, the activities were considered at-risk. When BMPs and standards were not being met and the disturbance was directly connected to the stream network then a failure rating was given." Table III-22G. Portions of Managed Watersheds Displayed by Percent Safeguarded, At-Risk or With Failure Rating, shows that relatively small percentages of the affected watersheds are at-risk or have a failure rating. While the acres in the above two categories are small compared to the entire project area, the FEIS should discuss why BMPs or standards at these managed sites were not being met rather than simply acknowledging that they are not presently being met.

ESA requested additional info on the effectiveness of current BMPs for mitigating sedimentation impacts.



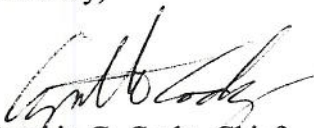
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We understand that a preferred alternative, based on the 1998 FEIS Alternatives and the additional Options discussed in the DSFEIS, will be selected in the Final Supplement to the Environmental Impact Statement.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DSFEIS as Category 2. This means that additional information, as noted, would more fully assess proposed action environmental impacts. A copy of our rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the referenced DSFEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,



Cynthia G. Cody, Chief
NEPA Unit
Ecosystem Protection Branch

cc: Elaine Suriano, OFA EPA-HQ

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-In-sufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."